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CLERK U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY _____
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

KIMEKA SIMMONS, HENRIQUE) Case No.: 1:23-cv-00523 JLT SAB
TARPEH, MALACHI HUEY, and EMMA)
HUEY, minors, by and through their)
Guardian Ad Litem, KIMEKA)
SIMMONS,) VERDICT FORM
Plaintiffs,)
v.)
BAUER RENTALS, REAGAN BAUER,)
and JANET BAUER,)
Defendants.)

We, the jury in the above-entitled action, find the following verdict on the question submitted to us:

QUESTION 1:

Did the defendants unlawfully refuse to allow the accommodation sought by Kimeka Simmons?

Yes _____ No X

If you answered "Yes," answer **Question 2**. If you answered "No," answer **Question 5**.

1 **QUESTION 2:**

2 Did the plaintiffs prove that the defendants' refusal to allow the accommodation caused the
3 plaintiffs harm?

4 Kimeka Simmons Yes _____ No _____

5 Henrique Tarpeh Yes _____ No _____

6 Malachi Huey Yes _____ No _____

7 Emma Huey Yes _____ No _____

8
9 If you answered "Yes" as to any plaintiff, answer **Question 3**. If you answered "No" as to all
10 plaintiffs, answer **Question 5**.

11
12 **QUESTION 3:**

13 **Answer this question only as to the plaintiffs for whom you answered "Yes" in Question**

14 **2.** What amount of damages do you award the plaintiff to compensate for the harm caused by the
15 defendants' refusal to allow the accommodation?

16
17 Kimeka Simmons \$ _____

18 Henrique Tarpeh \$ _____

19 Malachi Huey \$ _____

20 Emma Huey \$ _____

21
22 Answer **Question 4**.

1 **QUESTION 4:**

2 As to each plaintiff, you must award an additional amount of not less than \$4,000 but not
3 more than triple the damages awarded in Question 3. What additional amount do you award the
4 plaintiff?

5 Kimeka Simmons \$ _____

6 Henrique Tarpeh \$ _____

7 Malachi Huey \$ _____

8 Emma Huey \$ _____

9
10 Answer **Question 5.**

11
12 **QUESTION 5:**

13 Was plaintiffs' request for a reasonable accommodation of Kimeka Simmons' disability a
14 substantial motivating reason for the defendants' decision to not extend or renew the plaintiffs'
15 tenancy?

16 Yes: _____ No: X

17
18 If you answered "Yes," answer **Question 6.** If you answered "No," sign, date and return this verdict.

1 **QUESTION 6:**

2 Did the plaintiffs prove that the defendants' decision to not extend or renew the plaintiffs'
3 tenancy was a substantial factor in causing them harm?

4

5 Kimeka Simmons Yes _____ No _____
6 Henrique Tarpeh Yes _____ No _____
7 Malachi Huey Yes _____ No _____
8 Emma Huey Yes _____ No _____
9

10 If you answered "Yes" to as to any plaintiff, answer **Question 7**. If you answered "No" as to all
11 plaintiffs, sign, date and return this verdict.

12

13 **QUESTION 7:**

14 **Answer this question only as to the plaintiffs for whom you answered "Yes," in**
15 **Question 6.** What amount do you award the plaintiff for the defendants' unlawful decision to not
16 extend or renew the tenancy?

17 Kimeka Simmons \$ _____
18 Henrique Tarpeh \$ _____
19 Malachi Huey \$ _____
20 Emma Huey \$ _____
21

22 Answer **Question 8**.

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1 **QUESTION 8:**

2 Did the defendants act with malice or with reckless disregard for the rights of the plaintiffs?

3 Yes: _____ No: _____

6 **Sign, date, and return this verdict.**

7 Date: 2/27/25



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